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Hon. Brian D. Lynch
Chapter: 7
Hearing Date: January 8, 2019
Hearing Time: 9:00 a.m.
Location: Federal Building
500 West 12th Street, 2nd Floor
Vancouver, WA 98660
Response Date: January 2, 2019

Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

10 In re Case No. 18-43306-BDL
11 DEBORAH ANNE MILLER CHAPTER 7 TRUSTEE'S OBJECTION
12 Debtor. TO CLAIMED EXEMPTION

14 The Chapter 7 Trustee objects, as a precautionary matter, to the Debtor's claimed
15 exemption in a possible Gadolinium class action claim under 11 U.S.C. § 522 (d)(11)(D) as
16 premature, because the Debtor has valued the asset at "zero." Further, the applicability of the
17 exemption to the claim is unknown. As such, the Trustee's objection should be preserved until
18 such time as the value of the asset and applicability of the claimed exemption to the claim are
19 known.

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Two Centerpointe Dr., 6th Floor
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1 WHEREFORE, the Trustee respectfully requests an Order preserving the Trustee's
2 objection in the possible Gadolinium class action claim of Ms. Miller until such time as the
3 nature and extent of the claim is determined or until either party seeks determination of the
4 exemption.

5 DATED this 20th day of November, 2018

JORDAN RAMIS PC

By: /s/ Russell D. Garrett
Russell D. Garrett, WSBA #18657
Chapter 7 Trustee

DECLARATION OF SERVICE

I hereby certify that on the date shown below, I served a true and correct copy of the foregoing CHAPTER 7 TRUSTEE'S OBJECTION TO CLAIMED EXEMPTION on:

Deborah Anne Miller
1612 NW 23rd Ave
Battle Ground, WA 98604
Debtor

by first class mail, postage prepaid.

Susan H. Seelye
Brown & Seelye PLLC
744 S Fawcett Ave
Tacoma, WA 98402
(253) 573-1958
email: stopdebt@gmail.com
Debtor's Attorney

United States Trustee
USTPREGION18.SE.ECT@usdoj.gov

by electronic transmission and first class mail, postage prepaid.

DATED: November 20, 2018.

/s/ Russell D. Garrett
Russell D. Garrett, WSBA # 18657
Chapter 7 Trustee